

DOAR RIECK DeVITA KALEY & MACK
ATTORNEYS AT LAW

JOHN DOAR (1921-2014)
JOHN JACOB RIECK, JR.
JOHN F. KALEY
WALTER MACK
JAMES R. DeVITA

OF COUNSEL
JAMES I. WASSERMAN
MICHAEL MINNEFOR

ASTOR BUILDING
7TH FLOOR
217 BROADWAY
NEW YORK, N.Y. 10007-2911
TELEPHONE: (212) 619-3730
FACSIMILE: (212) 962-5037
e-mail: firm@doarlaw.com
website: www.doarlaw.com

January 20, 2017

VIA ECF, E-mail and Hand Delivery

Honorable Kimba M. Wood
Senior United States District Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. David Williams, Steven Brown, Gerald Seppala.*
Docket No. S3 16 Cr. 436 (KMW)

**Letter Application Seeking The Court's Permission For
Defendant Steven Brown To Travel To Europe On Business
The Berlin International Film Festival**

Dear Judge Wood:

I write again as the attorney for defendant Steven J. Brown to seek the Court's permission for Mr. Brown to travel to Germany to attend the Berlin International Film Festival.

Mr. Brown seeks to travel from approximately February 4 through February 12, 2017. His purpose would be to consummate film prospect transactions and set scheduling in face to face meetings with executives, producers and actors or their agents.

I do rely on the statements in my prior letters to the Court regarding this topic for the reasoning behind the importance of Mr. Brown's travel to major international film festivals.

The Berlin International Film Festival ("Berlinale") is a world leading film festival and

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media event. Its importance to the European Film Market trade fair held simultaneously as a major industry meeting for the international film circuit is richly described in the Wikipedia entry for the festival. The 67th Festival is scheduled to be held from February 9 to February 19, 2017 in Berlin.

I have again communicated with Assistant United States Attorney Patrick Egan who on behalf of the government does maintain his continuing objection to my client's international travel as he believes such presents flight risks for criminal defendants. He does not contemplate filing with the Court a separate letter opposing my request for this international travel. I have also communicated with Mr. Brown's Pretrial Services Officer Matthew Carter; Pretrial Services, as before, takes no position on international travel but does note for both AUSA Egan and myself that "the defendant has traveled with no issues. He communicated with me (Officer Carter) and promptly surrendered his passport upon return to the US." M.C. Email message, 1/17/2017, 1743.

Again, I believe neither the government nor Pretrial Services would challenge Mr. Brown's past compliance with his prior international travel obligations that were approved by this Court and supervised by Pretrial Services.

Thank you again for your consideration of these international travel requests.

Respectfully submitted,



Walter Mack

cc: AUSA Patrick Egan (by ECF and email)
PTSO Matthew Carter (by email)
PTSO Natasha Ramesar (by email)